

1 pathology, physiology, and histology. Gross pathological specimens are available.

2 ST. MATTHEW's has a gross anatomy lab. Rather than conducting cadaver
3 dissections, ST. MATTHEW's, like many U.S. medical schools, provides plastinated
4 cadavers in the anatomy class. The use of the plastinated cadavers has been hailed
5 as the future of anatomy courses.

6 ***d. There is a separate medical library area with a book and periodical collection***
7 ***that meets the minimum standards of a small medical school. Online resources***
8 ***such as Medline are available to students and faculty free of charge.***

9 REBUTTAL: ST. MATTHEW's has over 4,000 volumes in its medical library,
10 built around a core Brandon's Small Medical Library. ST. MATTHEW's also has
11 Medline and numerous other resources available online 24 hours a day for students
12 from Basic Sciences through Clinical Sciences. It has 59 hard-copy journals and over
13 three hundred journals available online. Additionally, all students have wireless laptop
14 computers and have access to hundreds of reference books with search capabilities
15 as well as medical journals twenty four hours a day, seven days a week whether in
16 Grand Cayman, the Maine extension campus, or anywhere in the U.S., Canada, or
17 the U.K.

18 ***e. There are facilities for quiet study time or research available to students.***

19 REBUTTAL: There is available space for 100 students to study in the library at
20 once. There is also a student lounge and study center, as well as open classrooms
21 equipped for small group study. Students have access to all library materials as well
22 as professor syllabi through their wireless laptops in each of these facilities.

23 ***f. There is a designated academic dean to supervise the integrity of the basic***
24 ***science program.***

25 REBUTTAL: ST. MATTHEW's has a full time Chief Academic Officer, a full-
26 time Dean of Basic Sciences and a Board of Trustees to supervise the integrity of the
27 basic science program.

28 ***i. Grading policies are consistent among all courses and reviewed regularly by***

1 ***the dean or appropriate committees.***

2 REBUTTAL: ST. MATTHEW's grading policies are consistent among all
3 courses, and at the end of each semester all grades are reviewed by the promotions
4 committee prior to final assignment.

5 81. Under AAIMG's criteria labeled "Section IV. Student Concerns," AAIMG cites the
6 following categories as "deficient":
7

8 ***b. Sufficient, affordable, housing is available to accommodate the student
and/or family members.***

9 REBUTTAL: Housing is available for all new incoming students as well as
10 some ongoing students in the university-owned residence halls for the first semester.
11 Within the local community, there are many excellent choices for apartments and
12 homes most certainly sufficient to meet the housing needs for all students in Grand
13 Cayman.

14 ***c. Dormitory accommodations at a reasonable rate are available for students
15 requesting this type of accommodation.***

16 REBUTTAL: As stated above, residence hall accommodations (dormitories) are
17 available, and are below the cost of rooms found in the private sector of the island.
18 The price includes all utilities, high speed internet access, swimming pool, and has
19 many forms of food service less than a block away. Each room contains a mini-
20 kitchen with a microwave and a small refrigerator. Students have the opportunity to
21 reduce costs by requesting a room mate.

22 ***f. A student health clinic and/or local health care resources are readily
23 available for routine health care needs.***

24 REBUTTAL: There are excellent, state-of-the-art health care resources readily
25 available for health care services well beyond the routine. Cayman boasts two
26 beautiful state-of-the-art hospitals and numerous highly-qualified practicing
27 physicians, most trained in the U.S. or Canada.

28 ***g. Emergency medical evacuation services/insurance are offered to students at***

1 ***a reasonable rate.***

2 REBUTTAL: Health insurance and medical evacuation insurance are not only
3 offered but required, and offered to students at reasonable rates through Student
4 Resources, a company that provides student health insurance to thousands of
5 students in the U.S. and other international schools. This health insurance program
6 also provides for medical evacuation. The cost is under \$89 per month for all
7 students.

8 ***m. Academic and psychological counseling are available free of charge from***
9 ***qualified staff or faculty members.***

10 REBUTTAL: Academic and psychological counseling are available free of
11 charge from qualified faculty members. Either or both may be required when a
12 student develops academic or personal problems. ST. MATTHEW's has a Dean of
13 Student Affairs who has a Ph.D. in psychology, as well as professionally trained
14 support staff.

15 ***n. The student attrition rate for all reasons remains low throughout the***
16 ***curriculum.***

17 REBUTTAL: Student attrition rate for all reasons remains approximately 10
18 percent throughout the curriculum, comparable or superior to other schools.

19 82. Under AAIMG's criteria labeled "Section V. Clinical Training Program," AAIMG
20 cites the following categories as "deficient":

21 ***b. There is a designated academic official to supervise the integrity of the***
22 ***clinical training program.***

23 REBUTTAL: ST. MATTHEW's employs a Chief Academic Officer (M.D.) and a
24 Clinical Dean (M.D.) who are experienced teachers with board certification in their
25 respective fields, with the Dean having prior experience as a director of residency
26 training. ST. MATTHEW's also has six Clinical Chiefs, who possess the M.D. and
27 who hold a board certification in their specialty, all of whom supervise the integrity of
28 the clinical training program.

d. Evaluation criteria and performance expectations are shared with students and preceptors prior to the clerkship rotation.

REBUTTAL: A Clinical Handbook is provided to each student at Clinical Orientation during his/her fifth semester. A complete Clinical Orientation Packet is provided and the Orientations include the Clinical Dean, Director of Clinical Development, Director of Clinical Services, Clinical Coordinators and Clinical Administrative Assistants. During this Orientation all staff members discuss various aspects and requirements of the Clinical Sciences program. A question and answer period is always included in the Orientation.

e. Hospital affiliations are listed in the school catalog. Students are not expected to find their own clerkships.

REBUTTAL: ST. MATTHEW's hospital affiliations are listed on the school website at www.stmatthews.edu. Students are *not expected* to find their own clerkships, and in fact they are *not permitted* to do so. ST. MATTHEW's has a Director of Clinical Services who supervises and manages all clerkship placements.

f. There is demonstrated continuity between the basic science campus and the clinical medicine program.

REBUTTAL: ST. MATTHEW's has a Chief Academic Officer ("CAO"), who is responsible for maintaining continuity between the Basic Sciences and Clinical Sciences. This is achieved through frequent meetings between the CAO, Dean of Basic Sciences, Basic Science Faculty and the Dean of Clinical Sciences, Clinical Chiefs, and Preceptors. More formalized meetings occur regularly to ensure continuity as well.

h. There are sufficient clerkship and staff members to process and track all students during third and fourth year rotations.

REBUTTAL: ST. MATTHEW's presently has approximately 350 students in clinical rotations. ST. MATTHEW's has a Clinical Dean (an M.D.), Director of Clinical Development (an M.S.), Director of Clinical Services (a B.A.), five Clinical Chiefs

(M.D.s), two Clinical Coordinators (B.A.s), and three Clinical Administrative Assistants to process and track all students during third and fourth year rotations. ST.

MATTHEW's has had no problems in keeping track of students, exams, or daily logs.

j. There are a sufficient number of hospitals and preceptors in hospitals with a structured teaching program to meet student needs.

REBUTTAL: ST. MATTHEW's currently has – and has always had – a surplus of clerkship slots in teaching hospitals, and has never failed to meet student needs for clerkships.

l. Full-time qualified medical school administrative staff are available to monitor the student's progress on a regular basis.

REBUTTAL: See rebuttal to statement "h," this section, *supra*.

m. Hospitals and preceptors are monitored on a regular basis by appointed staff.

REBUTTAL: See above rebuttals regarding supervisory staff; these staff members are charged with monitoring the hospitals and preceptors.

n. Student evaluations are done on a regular basis for each clerkship experience.

REBUTTAL: Student evaluation forms are now required to be completed after each clerkship experience, and therefore mandatory at this time.

83. Under AAIMG's criteria labeled "Section VI. Faculty," AAIMG cites the following categories as "deficient":

a. Names educational background and qualifications of faculty are reported in the school catalog and accurately represent actual on site, fulltime faculty.

REBUTTAL: The names, educational background and qualifications of ST. MATTHEW's faculty are currently reported in the school catalog and accurately represent actual on-site, fulltime faculty.

b. There is sufficient experienced, full-time, qualified faculty to teach each course in the curriculum.

REBUTTAL: ST. MATTHEW's has an excellent student teacher ratio, representing more than sufficient faculty. ST. MATTHEW's has 25 teachers in the Basic Sciences and 204 clinical preceptors, giving an overall 1:20 student/teacher ratio in Basic Sciences, and a 1:2 overall student/teacher ratio in the Clinical Sciences – far better than “sufficient.”

e. Faculty are not expected to cover more than 2 courses or teach out of their areas of expertise.

REBUTTAL: ST. MATTHEW's faculty members generally teach two or fewer courses, and only in their area of expertise.

h. Professional development opportunities are available to faculty locally.

REBUTTAL: ST. MATTHEW's faculty is fortunate in that many professional development programs are brought to Grand Cayman due to its desirability as a tourist location, and many physicians attend conferences locally for continuing education. Occasionally, ST. MATTHEW's faculty members both teach and participate in these continuing education opportunities. Annually, the Harvard International Program provides a teacher skills laboratory to help the teachers stay on the cutting edge of the case-based teaching model. Also, the University provides up to \$2,500 to each faculty member to attend their annual discipline conference in the U.S. or U.K. Also, each faculty is encouraged to be active in research, and stipends are available.

i. There are provisions for funding for faculty to attend professional meetings.

REBUTTAL: See rebuttal to statement “h,” this section, *supra*.

84. Under AAIMG's criteria labeled “Section VII. Financial,” AAIMG cites the following categories as “deficient”:

b. Students are provided with a realistic breakdown of cost of living expenses prior to matriculation.

REBUTTAL: Every student is provided with detailed cost guides and financial aid information specifically designed to educate them as to the costs of attending ST.

MATTHEW's.

e. A detailed description of all financial aid programs is listed in the school catalog.

REBUTTAL: A detailed description of all financial aid programs is listed in the school catalog along with information specifically as how to apply, the necessity of a credit worthy status, the three credit reporting agencies, as well as the recommendation to follow-up on loan status and ensure that students' credit is adequate.

f. Trained personnel are available to provide financial counseling.

REBUTTAL: ST. MATTHEW's Director of Financial Aid, Gloria Miranda-Avila, M.B.A., has fifteen years of experience at educational institutions as either director or assistant director of financial aid over many student loan programs, including the federal Stafford loan program. Ms. Miranda-Avila is always available to provide financial counseling to students, and does so through general emails as well as weekly online chats with prospective and enrolled students. Ms. Miranda-Avila also has a trained administrative assistant, to remain available to students and help her with these duties.

i. Scholarships on the basis of merit or need are available to qualified parties.

REBUTTAL: ST. MATTHEW's offers three academic scholarships annually with a total value of \$10,000 each. ST. MATTHEW's also offers one Caymanian scholarship annually to a worthy, qualified Caymanian. That scholarship is worth a total of \$45,000.

85. Under AAIMG's criteria labeled "Section VIII. Legal/Other," AAIMG cites the following category as "deficient":

c. Each school is evaluated for a history of failing to return tuition or deposits in a timely manner.

REBUTTAL: ST. MATTHEW's returns tuition or deposits absolutely according to its catalog requirements. It is clearly stated in ST. MATTHEW's catalog, and is

required of ST. MATTHEW's license issued by the Commission for Independent Education in the state of Florida, that all refunds will be made within 30 days of request. ST. MATTHEW's is not aware of a single case when a refund was later than the 30 days allowed.

86. AAIMG makes the additional, false statements regarding ST. MATTHEW's:

a. AAIMG states that ST. MATTHEW's is located in Ambergris Caye, Belize, Central America.

REBUTTAL: ST. MATTHEW's is based in Grand Cayman, Cayman Islands, British West Indies.

b. This school has experienced serious internal management problems with both high faculty and administrative turnover.

REBUTTAL: More than three years ago ST. MATTHEW's replaced its president, his wife, and an accountant; however, ST. MATTHEW's retained all of its U.S. management and a large number of its faculty and staff through the move.

c. Relocation of basic science campus last year to a rented office building in the Cayman Islands provides only the most basic classroom facilities.

REBUTTAL: This statement is completely inaccurate. ST. MATTHEW's has 21,000 square feet of leased space, which is a three story building totally occupied by ST. MATTHEW'S, and renovated to meet its specific needs, including being completely wired for high-speed internet access. As stated above, ST. MATTHEWS has also purchased a second residence hall, which gives it housing for 255 students on five acres of land, on which it will be building its new permanent campus.

d. The labs and library remain inadequate; plastinated parts are used in anatomy instead of cadavers.

REBUTTAL: ST. MATTHEW's labs are fully-equipped and state-of-the-art. As stated above, ST. MATTHEW's, like almost half of U.S. medical schools, provides plastinated cadavers in its anatomy classes, which provide for more detailed anatomical study.

e. School is very decentralized and the Maine campus at a small remote college still lacks proper structure for a basic science instruction.

REBUTTAL: ST. MATTHEW's has its own private facilities in Maine, with excellent faculty and administrators, and a strong clinical skills program. AAIMG's implies that ST. MATTHEW's is located at St. Joseph's College campus, which is untrue.

f. Portion of instruction done in USA may create licensing problems, although this school is still too new for many test cases. Possible licensing issues are still not realistically addressed by the school.

REBUTTAL: All student credits are listed on the Grand Cayman transcript, including those completed on the Maine campus – thus this is not an issue in regards to licensing.

g. School takes significant amount of transfer students and failures from other medical schools.

REBUTTAL: ST. MATTHEW's accepts a small percentage of transfer students from other accredited medical schools, as do all of the Caribbean schools and most medical schools around the world.

h. Web site is misleading as to facility and actual onsite fulltime faculty.

REBUTTAL: As stated above, ST. MATTHEW's accurately lists and identifies all of its faculty members on its website, including accurate photographs and credentials. All of ST. MATTHEW's faculty members are full-time with a few exceptions of local practicing physicians who teach portions of the clinical skills program.

i. Clerkship program is loosely organized.

REBUTTAL: ST. MATTHEW's clerkship program is tightly organized. ST. MATTHEW's has a Clinical Dean, who in turn has five Clinical Chiefs (one for each specialty) under him. Clinical chiefs oversee the Preceptors (teaching physicians) in ST. MATTHEW's affiliated teaching hospitals. ST. MATTHEW's additionally has

Clinical Coordinators that assign students to rotations and monitor their placement and progress. ST. MATTHEW's gives the NBME Shelf Exams following each core rotation. Each student must complete a daily log, which is submitted to the Clinical Dean for review and grading. ST. MATTHEW's accrediting body, the Accreditation Commission on Colleges of Medicine, is recognized by the U.S. Department of Education's National Committee on Foreign Medical Education and Accreditation, and this body oversees ST. MATTHEW's clinical clerkship programs and has approved its program.

INJURY TO ST. MATTHEW'S

87. ST. MATTHEW's has been grievously and irreparably injured as a result of AAIMG's, and AAIMG's agents' and representatives', unlawful and unethical conduct, including, but not limited to:

- damage to worldwide reputation;
- loss of applicants and student enrollment – past, present and future;
- interference with accreditation proceedings;
- damage to relationships with affiliate teaching hospitals;
- damage to relationships and contracts with student loan providers;
- damage to accreditation and license standing; and
- denials of clinical and residency placements for ST. MATTHEW's hard-working medical students and graduates.

The forgoing injuries are of such a nature and to such a degree that ST. MATTHEW's has no adequate remedy at law.

88. Defendants' actions constitute despicable and egregious acts of oppression, fraud and/or malice, intended by the Defendants to cause injury to the Plaintiff, and carried on with a willful and conscious disregard for the rights or well-being of others, such acts made even more despicable as they were committed under the guise of altruism and protection of public interests. Such contemptible conduct on the part of the Defendants calls for the maximum amount of exemplary damages awardable.

FIRST CLAIM FOR RELIEF

Fraud / Intentional Misrepresentation

(As To All Defendants)

89. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 89 of this Complaint.

90. The acts of Defendants as described above constitute fraud or intentional misrepresentation, in that:

91. Defendants have made, or knowingly conspired and agreed to be made, material misrepresentations and omissions as to the nature and quality of Plaintiff ST.

MATTHEW's educational services, faculty, and facilities, and as to the nature, acts, affiliations, and identities of Defendant AAIMG and individual Defendants, as detailed above.

92. Said misrepresentations and omissions were made with the knowledge or belief that the representations were false or without a sufficient basis for making the representations at the time that such representations were made.

93. Defendants intended to induce third persons to act based upon these representations and omissions, to the detriment of Plaintiff.

94. Third persons have justifiably relied upon such misrepresentations and omissions by accepting the critical statements regarding Plaintiff as accurate and acting in accordance thereto, including (but not limited to) choosing not to enroll with Plaintiff school, or denying Plaintiff's graduates post-graduate placements, or denying certain accreditations or approvals, all to the extreme detriment and injury of Plaintiff.

95. As a direct and proximate result of Defendants' acts as alleged herein, Plaintiffs have suffered and will continue to suffer damage to their business, goodwill, reputation and profits in an amount to be determined at trial.

96. Defendants have engaged in conduct of an oppressive, fraudulent, and malicious nature, thereby entitling Plaintiffs to an award of punitive damages.

97. Plaintiff has no adequate remedy at law.

SECOND CLAIM FOR RELIEF

**Federal Unfair Competition Comprising False and Misleading Statements of Fact
Under Section 43(a) of the Lanham Act, 15 USC §1125(a)
(As To All Defendants)**

98. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 98 of this Complaint.

99. Defendants' actions as described above have caused and are likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of Defendants with another person or entity, or as to the origin, sponsorship, or approval of Defendants' goods, services, or commercial activities by another person, and thus constitute false designations of origin, passing off, and unfair competition in violation of Section 43(a) of the Lanham Act, 15 U.S.C. §1125(a)(1)(A).

100. As a direct and proximate result of the actions, conduct, and practices of Defendants alleged above, Plaintiff has been damaged and will continue to be damaged.

101. Plaintiff has no adequate remedy at law.

THIRD CLAIM FOR RELIEF

**Federal Unfair Competition Comprising False Statements of Characteristics or
Origin Under Section 43(a) of the Lanham Act, 15 USC §1125(a)
(As To All Defendants)**

102. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 102 of this Complaint.

103. By engaging in the above-described activities, Defendants have made, or knowingly conspired and agreed to be made, false and misleading representations of fact in commercial promotions or advertising which misrepresent the nature, characteristics, qualities, or geographic origin of Defendants' and Plaintiff's goods, services, or commercial activities, all in violation of Section 43(a)(1)(B) of the Lanham Act, 15 U.S.C. §1125(a)(1)(B).

104. As a direct and proximate result of the actions, conduct, and practices of Defendants alleged above, Plaintiff has been damaged and will continue to be damaged.

105. Plaintiff has no adequate remedy at law.

FOURTH CLAIM FOR RELIEF

Defamation

(As to All Defendants)

106. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 106 of this Complaint.

107. Defendants' actions as described above constitute defamation, in that:

108. Defendants have made, or knowingly conspired and agreed to be made, false statements regarding Plaintiff ST. MATTHEW's, identified and rebutted in detail in the above paragraphs 74 through 87, incorporated herein by reference as though listed here;

109. Defendants' statements constitute defamation *per se*, in that they defame Plaintiff in its trade;

110. Defendants have further made, or knowingly conspired and agreed to be made, false statements regarding Defendants themselves, in relation to Plaintiff, falsely asserting non-existent qualities or attributes in comparison or contrast to Plaintiff, designed to falsely credit Defendants for qualities they did or do not possess;

111. Defendants knew or should have known that the statements published were false;

112. Defendants published these statements to various third parties without privilege;

113. As a proximate result of the foregoing acts, these Defendants have caused actual harm and are liable to Plaintiffs for damages in an amount to be proven at trial.

114. Defendants have engaged in conduct of an oppressive, fraudulent, and malicious nature, thereby entitling Plaintiffs to an award of punitive damages.

115. As a direct and proximate result of the actions, conduct, and practices of Defendants alleged above, Plaintiff has been damaged and will continue to be damaged.

116. Plaintiff has no adequate remedy at law.

FIFTH CLAIM FOR RELIEF

**For Violations of N.R.S. § 598.0915 (Acts of Deceptive Trade Practice)
(As To All Defendants)**

117. Plaintiff realleges and incorporates by reference paragraphs 1 through 117 of this complaint as though set forth fully herein.

118. By the acts described above, Defendants have engaged in unlawful and unfair business practices and have conducted unfair, deceptive and misleading advertising which has injured and threatens to continue to injure Plaintiff in its business and property, or have knowingly conspired and agreed to a common plan pursuant to such end.

Defendants' conduct constitutes unfair business practices under N.R.S. § 598.0915 *et seq.*, in that Defendants, as a non-exclusive list of examples:

- a. Knowingly made false representations as to affiliation, connection, association with or certification by another person (N.R.S. § 598.0915(3));
- b. Knowingly made false representations as to the characteristics, ingredients, uses, benefits, alterations or quantities of goods or services for sale or lease or a false representation as to the sponsorship, approval, status, affiliation or connection of a person therewith (N.R.S. § 598.0915(5));
- c. Represented that goods or services for sale or lease were of a particular standard, quality or grade, or that such goods were of a particular style or model, when they knew or should have known that they are of another standard, quality, grade, style or model (N.R.S. § 598.0915(7));
- d. Disparaged the goods, services or business of another person by false or misleading representation of fact (N.R.S. § 598.0915(8)); and
- e. Knowingly made any other false representation in a transaction (N.R.S. § 598.0915(15)).

119. As a direct result of the foregoing acts and practices, Plaintiff has suffered, and will continue to suffer, damages and irreparable harm.

120. Plaintiff has no adequate remedy at law.

SIXTH CLAIM FOR RELIEF

Computer Fraud Under The California Computer Crimes Act,

California Penal Code § 502

(As To All Defendants)

121. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 121 of this Complaint.

122. The acts of Defendants as described above constitute a violation of the California Computer Crimes Act, Cal. Penal Code § 502, as Defendants HOUGH, FREDRICK and DESAI, in their own interest and as agents and on behalf of Defendants SABA UNIVERSITY UNIVERSITY, MUA, EIC, INC., and EIC, LLC, knowingly accessed and without permission used, or conspired and agreed to so access and use, the computers, computer systems or computer networks of other persons to either devise or execute a scheme or artifice to defraud, deceive, or extort, or to wrongfully control or obtain money, property or data, by reason of which Plaintiff has suffered, and will continue to suffer, damages and irreparable harm.

SEVENTH CLAIM FOR RELIEF

Intentional Interference With Contractual Relations

(As To All Defendants)

123. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1 through 123 of this Complaint.

124. The aforesaid acts of Defendants constitute common tortious interference with Plaintiff's existing contractual relations with existing students, prospective students, graduates, and clinical residency providers, in that Defendants knew of these contractual relations, and purposefully and intentionally acted to interfere with or induce others to interfere with the performance or existence of these contractual relations or to induce others to do so, or knowingly conspired and agreed to a common plan pursuant to such end, to the detriment of Plaintiff.

///

1 125. As a direct and proximate result of Defendants' acts, Plaintiff has suffered, and will
2 continue to suffer, damages and irreparable harm.

3 126. Plaintiff has no adequate remedy at law.

4 **EIGHTH CLAIM FOR RELIEF**

5 **Intentional Interference With Prospective Economic Advantage**

6 **(As To All Defendants)**

7 127. Plaintiff repeats and realleges each and every allegation set forth in paragraphs 1
8 through 127 of this Complaint.

9 128. The aforesaid acts of Defendants constitute common tortious interference with
10 Plaintiff's prospective economic advantage with existing students, prospective students,
11 graduates, and clinical residency providers, in that Defendants acted purposefully and
12 intentionally to prevent the coming to fruition of potential economic advantages
13 Defendants knew to exist, or knowingly conspired and agreed to a common plan to such
14 end, with the intent of harming Plaintiff.

15 129. As a direct and proximate result of Defendants' acts, Plaintiff has suffered, and will
16 continue to suffer, damages and irreparable harm.

17 130. Plaintiff has no adequate remedy at law.

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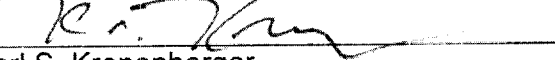
PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays that this Court enter judgment in its favor on each and every claim set forth above, and further prays an award to Plaintiff of:

1. Compensatory damages in an amount according to proof, but not less than \$50,000,000;
2. Punitive damages in an amount to be determined, but in no case less than treble Plaintiff's damages or \$150,000,000, whichever is greater;
3. A preliminary and permanent injunction ordering the transfer of the "aaimg.com" domain to Plaintiff;
4. An order for a public apology and retraction by the Defendants responsible for the acts alleged herein, to be disseminated as Plaintiff sees fit;
5. An injunction ordering the dissolution of Defendant AAIMG, and prohibiting Defendants from doing business, posting messages, or operating websites as AAIMG or any related entity or for any related or similar purpose as that of AAIMG;
6. Plaintiff's costs and attorneys' fees in this action; and
7. Such other further relief to which Plaintiff may be entitled as a matter of law or equity, or which the Court determines to be just and proper.

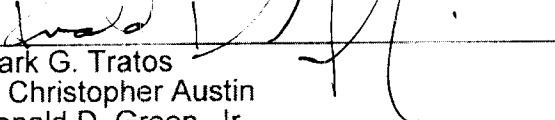
DATED: October 26, 2005.

KRONENBERGER & ASSOCIATES

By: 
Karl S. Kronenberger
Terri R. Hanley
Attorneys for Plaintiff
ST. MATTHEW'S UNIVERSITY (CAYMAN) LTD.

DATED: October 27, 2005.

GREENBERG TRAURIG, LLP


By: 
Mark G. Tratos
F. Christopher Austin
Ronald D. Green, Jr.
Designated Local Counsel for Plaintiff
ST. MATTHEW'S UNIVERSITY (CAYMAN) LTD.

DEMAND FOR JURY TRIAL

Plaintiff ST. MATTHEW'S hereby demands a trial of this action by jury.

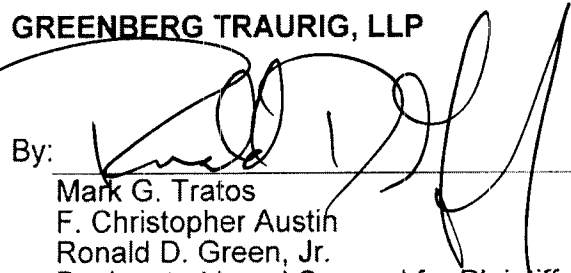
Dated: October 26, 2005

KRONENBERGER & ASSOCIATES

By: 
Karl S. Kronenberger
Terri R. Hanley
Attorneys for Plaintiff
ST. MATTHEW'S UNIVERSITY (CAYMAN) LTD.

DATED: October 27, 2005.

GREENBERG TRAURIG, LLP

By: 
Mark G. Tratos
F. Christopher Austin
Ronald D. Green, Jr.
Designated Local Counsel for Plaintiff
ST. MATTHEW'S UNIVERSITY (CAYMAN) LTD.

Karl S. Kronenberger

From: sarah weinstein [execsecaaimg@hotmail.com]
Sent: Wednesday, September 28, 2005 2:08 PM
To: info@kronenbergerlaw.com
Subject: AAIMG Litigation

Dear Mr. Kronenberger:

With the passing of Dr. Moore, AAIMG functions in Nevada have been dissolved and have been assumed by a new party.

Yours truly,

Sarah Weinstein

10/26/2005

Karl S. Kronenberger

From: Thomas Moore [aaimg@yahoo.com]
Sent: Wednesday, September 28, 2005 2:05 PM
To: karl@kronenbergerlaw.com
Cc: jthornton@smucayman.com
Subject: Case # CV-S-05-0848-RCJ-AAIMG

Dear Sir:

Please be informed that since the death of Dr. Moore there have been some delays in recovering mail sent to Nassau. AAIMG has transferred all intellectual property to another entity and will no longer be located in Nevada.

Sincerely,
Rachael Silver

Yahoo! Mail - PC Magazine Editors' Choice 2005 <http://mail.yahoo.com>

Karl S. Kronenberger

From: Thomas Moore [aaimg@yahoo.com]
Sent: Friday, October 07, 2005 6:17 AM
To: karl@kronenbergerlaw.com
Cc: jthornton@smucayman.com; info@smucayman.com
Subject: AAIMG Lawsuit

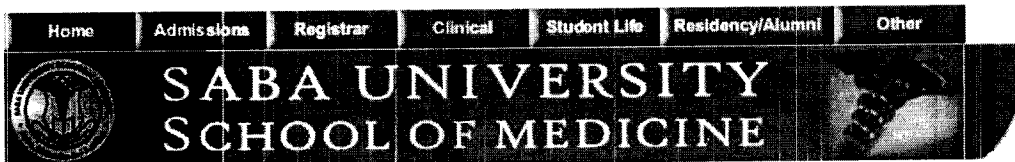
Dear Sir:

Pursuant to your client's legal action against AAIMG, please be informed that my husband, Dr. Thomas Moore, is deceased. Please further inform your client that no principle of AAIMG is a resident of the United States and that there are no assets in your country. The domain has been transferred to a new entity that will continue AAIMG's vital consumer advocacy mission.

Sincerely,

Diedre Moore

Yahoo! Mail - PC Magazine Editors' Choice 2005 <http://mail.yahoo.com>



Education For Life

Current Section Home

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- History
- Mission Statement
- Charter & W.H.O.
- Faculty & Staff

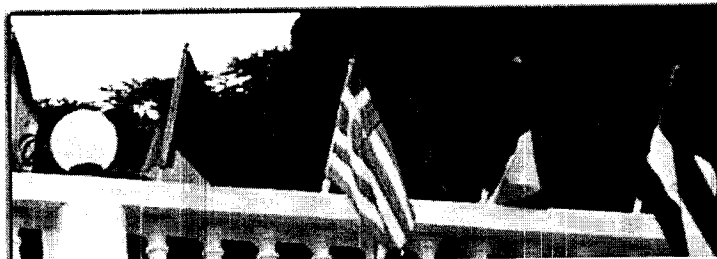
Saba and MUA Discussion Group

UNIVERSITY BOOKSONLINE



Welcome to the SABA University School of Medicine's web site. At this site you will find a school catalog and complete application forms for admission to our medical school. The decision to enter medicine and choosing the right medical school is an important consideration that will significantly affect your life and career. To help with your decision, consider the following about SABA University:

- Our medical curriculum is patterned after finest U.S. medical schools and is designed to meet the licensing requirements in the United States and other countries abroad.
- We admit approximately 50 students per semester.
- Our small student/faculty ratio allows for maximum interaction between students and professors
- Each student is treated as a professional by a caring, empathetic administration and staff.
- All classes are taught in English; Saba is a Dutch island with English as the first language.
- All faculty members at SABA University hold a Ph.D. or M.D. with teaching experience.
- After 20 months of Basic Science classes on Saba, the second two years of Clinical Medicine is offered through affiliated hospitals in the United States and the Netherlands-Antilles
- Currently, SABA University places students in clinical training in high quality teaching hospitals in major centers throughout the United States.
- Approved by the New York Department of Education and accredited by the (A.C.C.M.) Accreditation Commission of Colleges of Medicine.



Apply Online Now!

In The News

September 29, 2005

CONGRATULATIONS to Iman Imanirad for an outstanding USMLE board score: 257/99 for both Step I and II. Well done!

September 07, 2005

SABA STUDENTS HELP IN HURRICANE KATRINA'S AFTERMATH.

Clinical students are assisting with the hurricane crisis at Leonard J Chabert Medical Centre in Houma, LA located about 40 miles southwest of New Orleans. This 133 bed facility is gearing up to accept up to 200 patients who will be transferred in the coming weeks. Students are also providing support at the Civic Center and area shelters where hundreds of evacuees are staying. Liz Ferguson at Chabert stated that many former SABA students have called the hospital to offer their assistance in the relief effort. Ferguson stated that power has been restored to the facility, but computers are still not running. Ferguson noted that the SABA medical students have been absolutely terrific in helping out wherever they could and beyond their normal activity.

September 06, 2005

Congratulations to Sandeep Khosa for an outstanding USMLE Step I board score 249/99.

August 02, 2005

HEALTH INSURANCE APPLICATION NOW AVAILABLE ONLINE.

CMI Insurance Specialists through Heritage Insurance Agency now offers the convenience of online application for on island and clinical students. Students who wish to initiate or renew coverage may enroll at:

WWW.CMI-INSURANCE.COM/SABA.HTML

July 10, 2005

SUMMER 2005 NEWSLETTER now available under Student Life Section.

June 29, 2005

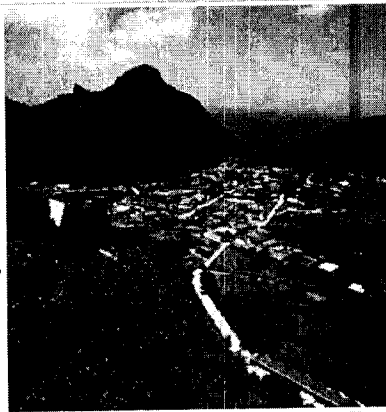
Faculty Recruitment. For details visit Employment List under Other section or contact Dr. Barbara VanRenterghem at the US Information Office at 1-978-630-5122 or Email bvanrent@saba.edu

May 27, 2005

SABA AWARDS 116 DEGREES AT 10TH COMMENCEMENT. Seventy-six graduates were on hand to receive the Doctor of Medicine degree on Saturday, May 21, 2005 at the historical Mechanics Hall in Worcester, MA. Peter Siersma, M.D., Ph.D, graduate from UMASS delivered the keynote address and was awarded an Honorary Degree in Science. Ambassador Crispin Gregoire from Dominica receive a Honorary Degree in Humane Letters. SABA presented 7 Dean of Clinical Medicine Awards and the SABA Foundation Award was awarded to Andrea Chamczuk as ambassador for the healing arts. Hundreds of family, friends and guests from around the world were on hand to witness the joyful



The Island of Saba is, without question, the finest island in the Caribbean to study medicine. Saba is a small, quiet, and picturesque Dutch island. SABA University was developed by major contributions from the local Dutch government and is, therefore, able to offer reasonable tuition, an active scholarship program, high quality instruction, and a continuous, stable future for our graduates.



celebration.

April 04, 2005

This year's residency appointments resulted in 16 specialties in 25 US states and Canada. The specialties include the following categories: Anesthesiology, Emergency Medicine, Family Medicine, Internal Medicine, Neurology, Neurosurgery, Ophthalmology, OB/GYN, Pathology, Pediatrics, Physical Medicine & Rehabilitation, Psychiatry, Radiology, Surgery Pre-Lim, Surgery and Transitional Year. For a listing of the 2005 Match results, visit our alumni and residency section.

March 11, 2005

Sunny Aslam and Vince Faridani, will represent SABA University at the 55th AMSA (American Medical Student Association) Convention on March 16-20 in Washington DC. This year's convention will focus on Global HIV/AIDS and Differences with U.S. and Canadian Healthcare Systems. Students will also have an opportunity to lobby Congress at Capitol Hill to "Fight for Safe, Effective and Affordable Drugs for All Americans".

On Saturday, March 19 at the Hyatt Regional Crystal City in DC, SABA will participate in the Medical School Fair for Pre-med students from around the country. Student representatives will be on hand between 5:30 to 7:30 to answer questions. AMSA is the largest annual gathering of medical students in the United States. Medical schools from around the world will be on hand to participate in on exciting programs and important educational opportunities.

January 21, 2005

Canadian student, Brendan Girschek, matched in Ophthalmology at Louisiana State University in New Orleans, LA. Congratulation!

January 10, 2005

Congratulations to Navi Shergill who recently passed the USMLE Step I with an outstanding board score of 250/99, Aaron Baxter scored 258/99 and Kristopher Stanton passed with a 250/99. Well done!

December 17, 2004

Medical students in the Class of 2007 were presented certificates of completion during the White Coat Ceremony on December 14, 2004. Dr. Vincent Knight, Associate Dean of Academic Affairs awarded 42 certificates. Dr. Anita Radix, presented the Community Award to Diana Hansen for her outstanding contribution to the community. Kristopher Stanton received the Dean of Basic Science Award for the highest academic achievement in the basic sciences. The White Coat ceremony is symbolic in completing the basic sciences and advancing to the clinical medicine portion. Many families, friends and guests were on hand to witness this important event followed by a reception that was held at the Round Hill Campus.

November 08, 2004

CONGRATULATIONS IS IN ORDER AND IT'S OFFICIAL.....The Medical Board of California Licensing Division has granted recognition to SABA UNIVERSITY SCHOOL OF MEDICINE. The Division has accepted the site inspection team's report & recommendations.

November 05, 2004

We are pleased to announce the following new faculty members. Dr. Khalid Ashfaq, Biochemistry; Dr. Joydeep Chaudhuri, Histology; Dr. Bruce Hundley, Physiology;

Dr. Eugene Petcu, Histology & Dr. R.N. Sreenathan, Anatomy. Welcome!

October 19, 2004

Andrey Espinoza, MD '97 Interventional Cardiologist @ Hunterdon Medical Center performs Carotid Artery Stenting to open up arteries in the neck for patients with 80% blockage. This technology has recently been approved by the FDA and is designed to prevent strokes.

October 18, 2004

Congratulations to Candice Shea who scored 251/99 on the USMLE Step I boards. Outstanding performance.

February 18, 2004

SABA Clinical students may now communicate with Basic Science students. [Click Here](#) to join the discussion group and share your clinical experiences.

June 05, 2003

SABA University officially approved by New York State Board of Medicine for unlimited clerkships & residencies. In January, a site visit was made by six team members to the campus and additional visits to the US office and clerkship sites in April 2003.



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U.S. Information/Admissions Office
Educational International Consultants, LLC
P.O. Box 386
Gardner, MA 01440, US
Telephone (978) 630-5122
Telephone Toll Free 800-825-7754
Fax (978) 632-2168
admissions@saba.edu

Caribbean Campus
Saba University School of Medicine
P.O. Box 1000
The Bottom, Saba, Netherlands-Antilles
Telephone 011- 599-4163456
Fax 011-599-4163458
info@saba.edu

The Current Date Is Tuesday October 25, 2005
The Current Time Is 05:49PM EDT

All information is deemed reliable but is not guaranteed and should be verified by the viewer.
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Integrity In Education

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MEDICAL UNIVERSITY OF THE AMERICAS

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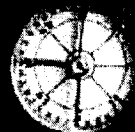
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Medical University of the Americas

UNIVERSITY BOOKS ONLINE!

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THE TOURISTS AND STUDENTS GUIDE TO NEVIS

Hurricane Policy

Welcome to the Medical University of the Americas website. Within this site you will find a [school catalog](#) and [complete application forms](#) for admission to our medical school. The decision to enter the medical field and choosing the right medical school is an important consideration that will significantly affect your life and career. This website was designed to inform prospective students about the quality of education that Medical University of the Americas has to offer. To assist you in your search, please consider the following:

- Our Medical [curriculum](#) is patterned after the finest U.S. medical schools and is designed to meet the licensing requirements in the United States and other countries abroad.
- Our small student/faculty ratio of 6:1, allows for maximum interaction between students and professors.
- Each student is treated as a professional by a caring, empathetic administration and staff.
- All classes are taught in English: [Nevis](#) is in the Federation of St. Kitts and [Nevis](#), a sovereign state within the British Commonwealth of Nations.
- After 20 months of [Basic Science](#) classes on Nevis, the second two years of [Clinical Medicine](#) is offered through affiliated hospitals in the United States, Europe and the West Indies.

Mission Statement

Integrity in Education is the hallmark by which the Medical University of the Americas operates. Students admitted to this program should expect nothing less than to be challenged by a very rigorous medical curriculum that will prepare them for the challenges of medical practice in the 21st century. The medical school embraces a special mission to train practitioners from the island of Nevis and the Caribbean region and to contribute to the improvements of health education, research and prevention for the local population.

What's New

October 10, 2005

On Saturday 10/01/2005, a sports tournament was held by the St Athletic Association in aid of the suffering from Hurricane Katrina. Competed in sports such as soccer, volleyball, tennis, 100 meter dash, basketball. This event, that also included a yard sale, bake sale, and B.B.Q. was successful in raising \$1800.00. The money was sent to Houma Hospital in LA. The sports champions received an Award from the Dean of Basic Science. Many thanks to those who supported this charity event and to the Student Athletic Association for organizing it.

September 13, 2005

Houma, Louisiana: Medical Student Chabert Medical Center in Houma, Louisiana report that the hospital is "running". While there was some damage, the institution did not suffer physical problems, and successfully functioned while on emergency for four days. The entire MUA "family" suffered a physical loss, and rotations resumed on September 6th as scheduled. The functioning hospital in Louisiana means students are getting a plethora of experience as part of their education to become physicians. We wish the best.

September 05, 2005

80 new students have arrived on Nevis to begin their education. Medical University of the Americas Student mentors helped new students become accustomed to "life on Nevis". Orientation went very well, and running smoothly. New this semester: extended library hours, and supplies of books and other learning resources. All of our faculty members are returning this semester, and will offer interesting electives in addition to core classes. Best wishes for the semester!

August 17, 2005

MUA is pleased to announce that the New York State Board of Medicine is making a site visit to the Nevis campus in November.

August 16, 2005

HEALTH INSURANCE APPLICATIONS NOW AVAILABLE ONLINE. CNA Insurance Specialists through Heritage Insurance Agency now offers the convenient online applications for island area.